ONGWAL FILE

Before the Federal Communications (Commission) Washington, DC 20554

In the matter of:

Amendment of part 97 of the

Commission's Rules Governing

Amateur Radio Services

Regarding Repeater and

Auxiliary Operation in the

1.25 Meter Band

> CEC SU 12 35 [11 19]

> RM-7869

> RM-7869

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RECEIVED

To: The Commission

DEC 3 0 1991

PETITION FOR RULE MAKING

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I, John Bainbridge, KB6IVI, hereby respectfully submit my request to the Federal Communications Commission to NOT take action on this Petition For Rule Making, RM-7869, as submitted by the American Radio Relay League.

When the lower 2 MHz of the 1.25 meter band was transferred to the commercial interest it was incumbent on the Amateur Community to move above 220.000 MHz. This has caused considerable expense to all Amateurs, particularly in California where the 1.25 mtr. band is heavily used. Our 220 S.M.A. has done a very fine job of relocating FM repeat-

meeting that developed the current Band Plan in effect in Southern California. Nor did they approach the S.M.A. seeking a way to solve their needs. Instead they request the ARRL to submit a request for a subband in the 220 MHz band that would be 300 % greater than they enjoyed pre-87-14. If the percentage of the band given up as a result of 87-14 represents 33 percent of the former band, then it would seem just that each segment of the now available frequency spectrum be utilized in the same proportion as pre - 8914. If this group would have requested consideration of their needs through the S.M.A., I feel certain a fair agreement could have been achieved.

If the request the ARRL makes is granted, the losses to the FM repeater segment will be tremendous. It is my opinion that the majority of use is in the FM repeater segment and the greatest amount of users would be better served. SSB, EME, CW, WEAK SIGNAL and EXPERIMENTAL are seriously under utilized in spite of unsubstantiated claims to the contrary.

The ARRL has for many years supported Regional Frequency Coordination by Amateurs themselves without any direction from the F.C.C. Now it seems the ARRL is quite willing to have the F.C.C. make the decisions for them.

The Amateur Radio Service needs to continue to be a self regulating group, within the frame work of good operating practice and sense of fair values determined by the Amateur Community themselves.

Again, I ask that you NOT approve RM-7869.

Respectfully submitted

December 20, 1991

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